

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
FORT WORTH DIVISION**

X CORP., a Nevada corporation,

Plaintiff,

vs.

MEDIA MATTERS FOR AMERICA, a
Washington, D.C. non-profit corporation,
ERIC HANANOKI, and **ANGELO
CARUSONE**,

Defendants.

Case No. 4:23-cv-01175-O

MOTION TO COMPEL PRODUCTION OF DOCUMENTS

Plaintiff X Corp. (“X”) brings this motion to compel against Defendants Media Matters for America, Eric Hanonoki, and Angelo Carusone. For the reasons stated in the accompanying brief in support, X requests that the Court issue an order overruling Defendants’ objections to X’s requests for production and requiring Defendants to promptly provide responsive documents so that the parties can meet the deadlines set out in the Court’s scheduling order.

Dated: May 24, 2024.

Respectfully submitted,

/s/ Christopher D. Hilton

Judd E. Stone II
Texas Bar No. 24076720
Christopher D. Hilton
Texas Bar No. 24087727
Ari Cuenin
Texas Bar No. 24078385
Alexander M. Dvorscak
Texas Bar No. 24120461
STONE | HILTON PLLC
1115 W. Slaughter Lane
Austin, TX 78748
Telephone: (737) 465-7248
judd@stonehilton.com
chris@stonehilton.com
ari@stonehilton.com
alex@stonehilton.com

John C. Sullivan
Texas Bar No. 24083920
S|L LAW PLLC
610 Uptown Boulevard, Suite 2000
Cedar Hill, TX 75104
Telephone: (469) 523-1351
Facsimile: (469) 613-0891
john.sullivan@the-sl-lawfirm.com

CERTIFICATE OF CONFERENCE

I certify that the parties have conferred on multiple occasions via email and telephone regarding the issues raised in the motion to compel beginning on April 9, 2024, and continuing through May 24, 2024. Although the parties narrowed some of their disagreements, there remain several intractable grounds of disagreement necessitating this motion.

/s/ Christopher D. Hilton
Christopher D. Hilton

CERTIFICATE OF SERVICE

I hereby certify that on May 24, 2024, a copy of this document was served on all counsel of record through the Court's CM/ECF system in accordance with the Federal Rules of Civil Procedure.

/s/ Alexander M. Dvorscak
Alexander M. Dvorscak